

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JEREMY ROSADO MATIAS

DEBTOR

CASE NO 15-00130-EAG

CHAPTER 13

**MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN**

TO THE HONORABLE COURT:

COMES NOW, JEREMY ROSADO MATIAS, debtor in the above captioned case through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a Post-confirmation Modification of Chapter 13 Plan, dated December 12, 2016, herewith and attached to this motion.

2. This Post-confirmation Modification of Chapter 13 Plan is filed to provide for the insufficiently funded.

WHEREFORE it is respectfully requested to this Honorable Court that the request for post confirmation modification of confirmed payment plan be accepted.

NOTICE IS HEREBY GIVEN TO PARTIES IN INTEREST THAT THEY HAVE TWENTYONE (21) DAYS TO OBJECT THE PROPOSED MODIFICATION OF THE CHAPTER 13 PLAN AND REQUEST A HEARING. ABSENT GOOD CAUSE UNTIMELY OBJECTIONS SHALL BE DENIED.

CERTIFICATE OF SERVICE: I hereby certify that the foregoing motion has been filed with the Clerk of the court using the CM/ECF system that will electronically notify parties in interest and to Chapter 13 Trustee, Jose R Carrion Morales, Esq., US Trustee Office. Non CM/ECF participants that are interested parties will be notified by regular US Postal Service.

RESPECTFULLY SUBMITTED.

In Cayey, Puerto Rico this 13th day of December, 2016.

/s/Miriam A. Murphy-Lightbourn
MIRIAM A. MURPHY LIGHTBOURN
PO BOX 372519
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United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. **2:15-bk-130**

ROSADO MATIAS, JEREMY

Chapter **13**

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 12/12/2016 <input type="checkbox"/> AMENDED PLAN DATED: _____ <input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other													
<p>I. PAYMENT PLAN SCHEDULE</p> <table style="width:100%;"> <tr> <td>\$ 200.00 x 17 = \$</td> <td>3,400.00</td> </tr> <tr> <td>\$ 0.00 x 5 = \$</td> <td>0.00</td> </tr> <tr> <td>\$ 260.00 x 12 = \$</td> <td>3,120.00</td> </tr> <tr> <td>\$ 392.00 x 26 = \$</td> <td>10,192.00</td> </tr> <tr> <td>\$ _____ x _____ = \$</td> <td></td> </tr> <tr> <td colspan="2" style="text-align: right;">TOTAL: \$ 16,712.00</td> </tr> </table> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows:</p> <p>_____</p> <p><input type="checkbox"/> Other:</p> <p>_____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ 16,712.00</p> <p>III. ATTORNEY'S FEES (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ 2,718.00</p> <p>Signed: <u>/s/ JEREMY ROSADO MATIAS</u> Debtor</p> <p>_____</p> <p>Joint Debtor</p>	\$ 200.00 x 17 = \$	3,400.00	\$ 0.00 x 5 = \$	0.00	\$ 260.00 x 12 = \$	3,120.00	\$ 392.00 x 26 = \$	10,192.00	\$ _____ x _____ = \$		TOTAL: \$ 16,712.00		<p>II. DISBURSEMENT SCHEDULE</p> <p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</p> <p>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. BANCO POPULAR D Cr. BANCO POPULAR D Cr. _____ # Post 6934 # Claim 4 # _____ \$ 1,489.00 \$ 10,338.23 \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: _____ 5. <input type="checkbox"/> Other: _____ 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: BANCO POPULAR D C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) * "Tax refunds, if any, will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds." </p>
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Attorney for Debtor **Miriam A. Murphy & Associates PSC**

Phone: **(787) 263-2377**